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NOTES OF CASES.

Warning to Claim Adjusters.—"Fighting fire with fire" is not proper conduct for an attorney in claim adjusting. See *In re Robinson* (Court of Appeals of New York, 103 Northeastern Reporter, 160) affirming (Supreme Court, Appellate Division) 136 New York Supplement, 548. This was a proceeding to disbar Henry A. Robinson, an attorney. Robinson was general solicitor of the Metropolitan Street Railway Company. The charge against him was misconduct in participating in and authorizing the payment of sums of money by the company to employees, who were called detectives or investigators, in relation to litigation before the courts wherein the railroad company was defendant. The evidence in the lower court showed that Robinson was the head of an extensive system of claim adjustment, that he personally countenanced the paying of large sums to investigators and detectives, clerks and officers of courts, policemen, and witnesses. "It was a system that deliberately conducted to bribery and subornation of perjury." The Court of Appeals further says: "The duty of an attorney for a person or corporation may require him, personally or otherwise, to interview all of the witnesses to a transaction or occurrence, whether such witnesses are favorable to the claimant or not, for the purpose of ascertaining, so far as possible, the extent of the liability of his client, if any, by reason of such transaction or occurrence. Money paid for the reasonable expenses of an investigator to ascertain the names of witnesses and their knowledge on the subject under consideration constitutes a legitimate expenditure by a person or corporation charged with liability by reason of negligence or for any other cause, and such reasonable payments are not subject to criticism, and do not justify a charge against an attorney who approves the same. Reasonable expenditures for investigation by an expert for the purpose of making such expert a witness upon a trial are also a legitimate expenditure. The court held that the evidence tended to support some of the specific charges, and said: "It is also true of the elaborate system developed by the appellant and the lavish expenditures of money in connection therewith, all of which inevitably tended to interfere with the administration of justice and to bring the courts into disrepute. The appellant's connection with the system and the acts and expenditures connected therewith were so intimate and controlling that the purpose of the system and the details in carrying it out are directly chargeable to him." Disbarment order was affirmed.

Automobiles—Blessing or Curse?—It may be interesting to see the liability which attaches as soon as a person becomes an owner of an automobile. To the walking populace and to owners of valuable